California State Automobile Association

SERVING THE MOTORIST SINCE 1900

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EXECUTIVE OFFICES

May 25, 1993

In the Matter of:

Replacement of Part 90 by
Part 88 to Revise the Private
Land Mobile Radio Services and
Modify the Policies Governing
Them

93-235

To: The Commission

The California State Automobile Association (CSAA), an automobile club representing over 3,200,000 members in California and Nevada, provided emergency road service in over 2,544,210 occasions in 1992. These requests originated not only from our members, but from public service agencies, such as the California Highway Patrol, California Department of Transportation, Nevada Highway Patrol, county sheriff, city police and fire departments. These calls for roadside assistance were referred to one of CSAA's 17 Central Dispatch Centers (CDF), or directly to the Association's 285 emergency road service independent contractors. Over 85%, or 2,188,626, requests for help were received and dispatched by CSAA employees at one of our dispatch centers.

Plans are currently being made to expand our central dispatch coverage so that all calls within the CSAA territory are answered and dispatched by CSAA employees. Currently, to provide the necessary radio coverage, CSAA maintains a radio network of 60 primary and back-up transmitters and over 1,200 mobile radios.

It is not only traffic accidents that generate service requests that require immediate attention

sheriff, police and fire departments and the call volume is substantial. These calls are not from motorists calling from home, the mall or reasonably safe locations. These are requests from the CHP and other public agencies to help them in clearing the highway of stalls or accident often where there is the potential for further accidents or increased traffic congestion. Statistics show that stalled vehicles and traffic accidents cause 50% of the congestion on our highways. A quick response to these incidents prevents further delays, conserves fuel, and cuts down on air pollution. Even more important is the motorist's personal safety. These breakdowns often occur late at night, in inclement weather, dangerous traffic situations, or in unsafe areas.

CSAA has an emergency response team on call, and when requested, responds to provide

reduce the amount coverage in fringe areas to ZERO and in other areas to minimal or none at all. It will effectively eliminate any wide area coverage from a central site. CSAA projects the costs to be quite high to add significantly more transmitters and sites to provide the same coverage we do now from strategically placed transmitters and with fewer available frequencies.

We are currently providing radio coverage in San Francisco with two transmitters off a central location. Under this proposal the reduction in ERP, and the hilly terrain in San Francisco, will reduce the effective coverage by over 70%. We will need to add four to five additional transmitters to cover the same area. Radio coverage from the Capitola, Reno, Santa Rosa, Las Vegas, Napa, Lake Tahoe and Concord CDFs will also be reduced significantly and require additional transmitters and sites to provide the present level of coverage.

Radio coverage in rural or suburban areas will be affected to a greater degree than urban locations because of the greater distances between towns/sites and lack of available transmitter sites to overcome terrain obstacles. For example, in some areas it may be 100 or more miles between towns and the radio coverage is most often provided from a mountain top transmitter site. With the proposed reduction in power, this will leave many miles of highway without radio coverage and inhibit the prompt dispatching of assistance to disabled motorists and public safety agencies. Las Vegas, Nevada is a prime example: we offer emergency road service to motorists travelling on I-15 where in summer months temperatures can exceed 120 degrees. Currently we cover an area extending to the California-Nevada border, a heavily travelled but desolate area, in which, with reduced power, we would lose vital radio coverage. Worse, we may not be able to obtain a transmitter site or radio channel to cover if Part 90 is changed as suggested. In both the urban and rural areas, the additional transmitter sites may not be available or only at a great increase in expense. There are also the environmental issues involved in dramatically increasing the number of sites in a given area. Developers in many areas in the country, particularly on the west coast, would face a stiff battle if they proposed doubling the number of transmitter sites in a given area.

CSAA estimates that to maintain our present level of service and coverage under this proposal will require an additional 20 to 25 transmitter sites. With average cost per transmitter of $8,800, our expenditure would be $198,000 in equipment costs alone. Our costs would not only include the actual cost of the transmitter and antenna, but additionally the cost of licensing and frequency coordination, site development and site rental, phone line or microwave costs and the necessary upgrades to dispatch center facilities. We estimate the first year cost to add each site to be $15,025, with $3,050 in recurring annual costs for site rental and phone lines. In areas where it will be necessary to add transmitter locations on the same frequency, it will be necessary to build out a similcast or voting system. The cost for this technology could be more than $100,000 per CDF plus transmitter site and frequency coordination. Using microwave or links to control transmitters will add to the site expense. These additional locations will also have a significant impact on our maintenance budgets and radio maintenance salary expenses.

Under this proposal, the FCC will require users of both the 150 MHz and 450 MHz bands to reduce their occupied bandwidth from 25 kHz to 12.5 kHz for the 150 MHz band and 10 kHz in the 450 MHz band. To accomplish this the FCC proposes that users decrease the deviation of their radios which will degrade the performance of a radio that is designed to operate at a higher deviation. The radio will not be operating as effectively as it was

designed. This will also affect the operation of CTCSS (tone coded squelch - PL) - such that it may not operate properly. (The deviation can also be described as the audio level. If the deviation is lowered, the effective audio level is also lowered.)

The radio receivers are also affected by this change, as they are designed to accept a wider bandwidth signal than they will be receiving under the proposed change. The FCC recommends "narrowing the bandwidth" of the receiver to improve the operating

manufacturers can actually deliver equipment, not just the promise of radios, and the Commission adapt ERP limits more in line with those that have been adapted for the 800 MHz band which we feel are more realistic than those proposed. CSAA opposes the consolidation of the existing radio services into three groups with the use of multiple frequency coordinators within a single radio service. CSAA would support consolidation if the Automobile Club frequencies were protected in contiguous blocks as they are now and were included in the public safety pool rather than the non-commercial pool.

CSAA urges the commission to carefully evaluate the broad effects of the proposal and the impact, both logistically and financially, this will have on CSAA, automobile clubs in general, public safety agencies and other radio users.

Sincerely

Brian Hill
President

BH/mr